



ND

November 27, 2017

U.S. Environmental Protection Agency
Region VIII
Director, Air Toxics Technical
Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice
Mail Code 8ENF-AT
1595 Wynkoop Street
Denver, CO 80202-1129

Re: Nine Point Energy, LLC's Amended Report Pursuant to 40 C.F.R. § 60.5420a(b)

Dear Director:

Nine Point Energy, LLC ("Nine Point") is amending its annual report to incorporate additional reporting provisions not previously included in the report submitted October 30, 2017 pursuant to 40 C.F.R. § 60.5420a(b). Specifically, Nine Point has revised its report for storage vessel affected facilities, which addresses the Professional Engineer ("PE") certification requirement. As Nine Point noted in its previous letter, significant regulatory uncertainty resulted from EPA's attempt to administratively stay the effective date of certain Quad Oa provisions, including the PE certification requirement. Nine Point will address all items as noted in its annual report, including the PE certification.

Pursuant to 40 C.F.R. § 60.5420a(b)(iv), please find the following certification statement:

~~[Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.]~~

If you have any questions or need further information, please contact me at 720-697-2111.

Sincerely,

(b) (6)

Tony Hale
Vice President, Operations

Well Completions												
Company Name	Facility Name	US API Well ID	Description of Site Location	Location of well affected facility		Date of Well Completion	Does well completion	What type of well was completed?	Will liquids be routed to...	Gas will be routed to...	Gas will be...	Two Day Notification Provided?
				Latitude	Longitude							
Nine Point Energy	Little Muddy 17H	33105042350000	From Williston ND Head east on E Broadway toward 3rd Ave E 1.1 mi Turn left onto 20th Ave E/U.S. 85 B Continue to follow U.S. 85 B Facility will be on the left	(b) (9)	(b) (9)	6/7/2016	YES	NONE OF THE ABOVE	One or more completion or storage vessels	N/A	Flared	No
Nine Point Energy	Little Muddy 19H	33105042360000	From Williston ND Head east on E Broadway toward 3rd Ave E 1.1 mi Turn left onto 20th Ave E/U.S. 85 B Continue to follow U.S. 85 B Facility will be on the left	(b) (9)	(b) (9)	6/6/2016	YES	NONE OF THE ABOVE	One or more completion or storage vessels	N/A	Flared	No
Nine Point Energy	Little Muddy 21H	33105042370000	From Williston ND Head east on E Broadway toward 3rd Ave E 1.1 mi Turn left onto 20th Ave E/U.S. 85 B Continue to follow U.S. 85 B Facility will be on the left	(b) (9)	(b) (9)	6/4/2016	YES	NONE OF THE ABOVE	One or more completion or storage vessels	N/A	Flared	No
Nine Point Energy	Little Muddy 23H	33105042380000	From Williston ND Head east on E Broadway toward 3rd Ave E 1.1 mi Turn left onto 20th Ave E/U.S. 85 B Continue to follow U.S. 85 B Facility will be on the left	(b) (9)	(b) (9)	6/3/2016	YES	NONE OF THE ABOVE	One or more completion or storage vessels	N/A	Flared	No
Nine Point Energy	Anderson 148-100-7-6-3H	33053063830000	From Williston ND Drive from 2nd Ave W to Williston 5 min (1.6 mi) Take W Front St to US-85 S 9 min (3.6 mi) Turn left onto US-85 S 32 min (31.3 mi) Continue on Co Rd 27. Drive to 16 Street Northwest in Central McKenzie	(b) (9)	(b) (9)	7/9/2017	YES	NONE OF THE ABOVE	One or more completion or storage vessels	Gas Flow Line / Collection System	Flared	Yes
Nine Point Energy	Anderson 148-100-7-6-2H	33053063820000	From Williston ND Drive from 2nd Ave W to Williston 5 min (1.6 mi) Take W Front St to US-85 S 9 min (3.6 mi) Turn left onto US-85 S 32 min (31.3 mi) Continue on Co Rd 27. Drive to 16 Street Northwest in Central McKenzie	(b) (9)	(b) (9)	7/9/2017	YES	NONE OF THE ABOVE	One or more completion or storage vessels	Gas Flow Line / Collection System	Flared	Yes

Well Completions												
Company Name	Facility Name	US API Well ID	Description of Site Location	Location of well affected facility		Date of Well Completion	Does well completion	What type of well was completed?	Will liquids be routed to...	Gas will be routed to...	Gas will be...	Two Day Notification Provided?
				Latitude	Longitude							
Nine Point Energy	Anderson 148-100-7-6-4H	33053066110000	From Williston ND Drive from 2nd Ave W to Williston 5 min (1.6 mi) Take W Front St to US-85 S 9 min (3.6 mi) Turn left onto US-85 S 32 min (31.3 mi) Continue on Co Rd 27, Drive to 16 Street Northwest in Central McKenzie	(b) (9)	(b) (9)	7/9/2017	YES	NONE OF THE ABOVE	One or more completion or storage vessels	Gas Flow Line / Collection System	Flared	Yes
Nine Point Energy	Larsen 157-101-28-33-3H	33105029890000	From Williston ND Head east on E Broadway toward 3rd Ave E 29 s (0.1 mi) Continue on University Ave to US-2 E/2nd Ave W 6 min (2.0 mi) Continue on US-2 E to Athens 19 min (17.2 mi) Continue on 69th St NW to your destination in Blacktail	(b) (9)	(b) (9)	6/9/2017	YES	NONE OF THE ABOVE	One or more completion or storage vessels	Gas Flow Line / Collection System	Flared	No
Nine Point Energy	Larsen 157-101-21-16-3H	33105029920000	From Williston Head east on E Broadway toward 3rd Ave E 29 s (0.1 mi) Continue on University Ave to US-2 E/2nd Ave W 6 min (2.0 mi) Continue on US-2 E to Athens 19 min (17.2 mi) Continue on 69th St NW to your destination in Blacktail	(b) (9)	(b) (9)	6/9/2017	YES	NONE OF THE ABOVE	One or more completion or storage vessels	Gas Flow Line / Collection System	Flared	No

Well Completions							
Facility Name	Is the well subject to well completion requirements?	\$60.5375a well completion requirements			Recordkeeping Options	Reporting Information	
		Initial Flowback Stage	Separation Flowback Stage	NOTE		Beginning Date of Reporting Period	Ending Date of Reporting Period
Little Muddy 17H	YES, well completion operation is subject to §60.5375a	Route flowback to completion/storage vessels and commence operation of separator	Route liquids from separator to completion/storage vessels	If it is technically infeasible for the separator to function then the separator can be bypassed	Photos are allowed. Please complete photos section. If photos are not available please complete written section.	August 2, 2016	August 1, 2017
Little Muddy 19H	YES, well completion operation is subject to §60.5375a	Route flowback to completion/storage vessels and commence operation of separator	Route liquids from separator to completion/storage vessels	If it is technically infeasible for the separator to function then the separator can be bypassed	Photos are allowed. Please complete photos section. If photos are not available please complete written section.	August 2, 2016	August 1, 2017
Little Muddy 21H	YES, well completion operation is subject to §60.5375a	Route flowback to completion/storage vessels and commence operation of separator	Route liquids from separator to completion/storage vessels	If it is technically infeasible for the separator to function then the separator can be bypassed	Photos are allowed. Please complete photos section. If photos are not available please complete written section.	August 2, 2016	August 1, 2017
Little Muddy 23H	YES, well completion operation is subject to §60.5375a	Route flowback to completion/storage vessels and commence operation of separator	Route liquids from separator to completion/storage vessels	If it is technically infeasible for the separator to function then the separator can be bypassed	Photos are allowed. Please complete photos section. If photos are not available please complete written section.	August 2, 2016	August 1, 2017
Anderson 148-100-7-6-3H	YES, well completion operation is subject to §60.5375a	Route flowback to completion/storage vessels and commence operation of separator	Route liquids from separator to completion/storage vessels	If it is technically infeasible for the separator to function then the separator can be bypassed	Photos are not allowed. Please complete written section.	August 2, 2016	August 1, 2017
Anderson 148-100-7-6-2H	YES, well completion operation is subject to §60.5375a	Route flowback to completion/storage vessels and commence operation of separator	Route liquids from separator to completion/storage vessels	If it is technically infeasible for the separator to function then the separator can be bypassed	Photos are not allowed. Please complete written section.	August 2, 2016	August 1, 2017
Anderson 148-100-7-6-4H	YES, well completion operation is subject to §60.5375a	Route flowback to completion/storage vessels and commence operation of separator	Route liquids from separator to completion/storage vessels	If it is technically infeasible for the separator to function then the separator can be bypassed	Photos are not allowed. Please complete written section.	August 2, 2016	August 1, 2017
Larsen 157-101-28-33-3H	YES, well completion operation is subject to §60.5375a	Route flowback to completion/storage vessels and commence operation of separator	Route liquids from separator to completion/storage vessels	If it is technically infeasible for the separator to function then the separator can be bypassed	Photos are not allowed. Please complete written section.	August 2, 2016	August 1, 2017

Well Completions							
Facility Name	Is the well subject to well completion requirements?	§60.5375a well completion requirements			Recordkeeping Options	Reporting Information	
		Initial Flowback Stage	Separation Flowback Stage	NOTE		Beginning Date of Reporting Period	Ending Date of Reporting Period
Larsen 157-101-21-16-3H	YES, well completion operation is subject to §60.5375a YES, well completion operation is subject to §60.5375a	Route flowback to completion/storage vessels and commence operation of separator	Route liquids from separator to completion/storage vessels	If it is technically infeasible for the separator to function then the separator can be bypassed	Photos are not allowed. Please complete written section.	August 2, 2016	August 1, 2017

Completions Written							
Facility Name	US API Well ID	Location of well affected facility		Is written recordkeeping required?	For onset of flowback record...		
		Latitude	Longitude		Does this apply?	...date	...time
Little Muddy 17H	33105042350000	(b) (9)	(b) (9)	N/A	Yes	12/19/2016	12:30 PM
Little Muddy 19H	33105042360000			N/A	Yes	11/27/2016	10:30 PM
Little Muddy 21H	33105042370000			N/A	Yes	11/27/2016	10:30 PM
Little Muddy 23H	33105042380000			N/A	Yes	12/31/2016	11:50 AM
Anderson 148-100-7-6-3H	33053063830000			N/A	Yes	7/11/2017	9:30 PM
Anderson 148-100-7-6-2H	33053063820000			N/A	Yes	7/10/2017	6:50 PM
Anderson 148-100-7-6-4H	33053066110000			N/A	Yes	7/10/2017	1:30 PM
Larsen 157-101-28-33-3H	33105029890000			N/A	Yes	6/13/2017	9:07 AM
Larsen 157-101-21-16-3H	33105029920000			N/A	Yes	7/2/2017	8:30 PM

Completions Written								
Facility Name	For each attempt to direct flowback to a separator record...							
	1st attempt		2nd attempt		3rd attempt		4th attempt	
	...date	...time	...date	...time	...date	...time	...date	...time
Little Muddy 17H	12/27/2016	3:00 PM	12/31/2016	9:00 AM	1/3/2017	11:45 PM	1/9/2017	3:30 PM
Little Muddy 19H	12/27/2016	3:30 PM	12/31/2017	12:30 PM	1/9/2017	3:30 PM		
Little Muddy 21H	12/28/2016	1:00 PM	12/31/2016	3:00 AM				
Little Muddy 23H	1/3/2017	3:30 PM						
Anderson 148-100-7-6-3H	8/19/2017	5:00 AM	8/25/2017	5:30 AM	8/26/2017	3:00 PM		
Anderson 148-100-7-6-2H	8/27/2017	7:30 AM	8/29/2017	4:00 AM	8/30/2017	10:05 AM		
Anderson 148-100-7-6-4H	8/16/2017	8:00 AM	8/18/2017	4:05 PM				
Larsen 157-101-28-33-3H	6/20/2017	1:00 PM	6/21/2017	9:38 PM	7/7/2017	8:31 PM	7/8/2017	7:20 PM
Larsen 157-101-21-16-3H	7/3/2017	9:00 AM	7/4/2017	10:00 AM	7/6/2017	11:00 PM		

[illegible]

Completions Written									
Facility Name	When flowback equipment is permanently disconnected or start of			Duration of flowback (hours) is...	If liquids were not expected but conditions changed to allow				
	Does this apply?	...date	...time		Does this apply?	Well completion		Separator installed	
						...date	...time	...date	...time
Little Muddy 17H	Yes	1/18/2017	5:00 AM	639.5	N/A				
Little Muddy 19H	Yes	1/18/2017	5:00 AM	547.5	N/A				
Little Muddy 21H	Yes	12/31/2016	3:30 PM	75.5	N/A				
Little Muddy 23H	Yes	1/3/2017	5:00 AM	58.0	N/A				
Anderson 148-100-7-6-3H	Yes	9/5/2017	10:25 AM	308.5	N/A	N/A	N/A	N/A	
Anderson 148-100-7-6-2H	Yes	9/5/2017	9:15 AM	296.5	N/A	N/A	N/A	N/A	
Anderson 148-100-7-6-4H	Yes	8/21/2017	9:00 AM	154.0	N/A	N/A	N/A	N/A	
Larsen 157-101-28-33-3H	Yes	7/11/2017	10:00 AM	185.5	N/A	N/A	N/A	N/A	
Larsen 157-101-21-16-3H	Yes	7/11/2017	5:00AM	196.0	N/A	N/A	N/A	N/A	

Completions Written						
Facility Name	Does this apply?	Gas will be routed to...	Hours gas was routed	Gas will be...	Hours gas was flared	Hours gas was vented
Little Muddy 17H	Yes	One or more completion or storage vessels			492.5	
Little Muddy 19H	Yes	One or more completion or storage vessels			529.0	
Little Muddy 21H	Yes	One or more completion or storage vessels			66.5	
Little Muddy 23H	Yes	One or more completion or storage vessels			57.0	
Anderson 148-100-7-6-3H	Yes	One or more completion or storage vessels	246.0	Gas Flow Line / Collection System	156.5	
Anderson 148-100-7-6-2H	Yes	One or more completion or storage vessels	178.0	Gas Flow Line / Collection System	100.0	
Anderson 148-100-7-6-4H	Yes	One or more completion or storage vessels	64.0	Gas Flow Line / Collection System	98.0	
Larsen 157-101-28-33-3H	Yes	One or more completion or storage vessels	62.5	Gas Flow Line / Collection System	33.5	
Larsen 157-101-21-16-3H	Yes	One or more completion or storage vessels	104.5	Gas Flow Line / Collection System	83.5	

Completions Written							
Facility Name	Technically infeasible to route gas for useful purpose						
	Does this apply?	Name of gathering line	Location of gathering line	Technical reason unable to...			
				...route to gathering line	...inject / reinject into well	...use as onsite fuel	...replace other fuel or raw material
Little Muddy 17H	Yes	ONEOK	behind production facility near entrance of location	pipeline not available during completions			
Little Muddy 19H	Yes	ONEOK	behind production facility near entrance of location	pipeline not available during completions			
Little Muddy 21H	Yes	ONEOK	behind production facility near entrance of location	pipeline not available during completions			
Little Muddy 23H	Yes	ONEOK	behind production facility near entrance of location	pipeline not available during completions			
Anderson 1148-100-7-6-3H	Yes	Caliber Midstream	behind production facility near entrance of location	N/A	N/A	N/A	N/A
Anderson 1148-100-7-6-2H	Yes	Caliber Midstream	behind production facility near entrance of location	N/A	N/A	N/A	N/A
Anderson 1148-100-7-6-4H	Yes	Caliber Midstream	behind production facility near entrance of location	N/A	N/A	N/A	N/A
Larsen 1157-101-28-33-3H	Yes	ONEOK	behind production facility near entrance of location	N/A	N/A	N/A	N/A
Larsen 1157-101-21-16-3H	Yes	ONEOK	behind production facility near entrance of location	N/A	N/A	N/A	N/A

Storage Vessel															
Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K	Column L	Column M	Column N	Column O	Column P
Facility Name	Storage Vessel Record Keeping Requirements (§60.5420a(c)(5) through (8), (12) through (14), and (17), as applicable)														
	VOC emissions determination for each	Model or calculation	Records of deviations ¹	Identification and location of each		Record of each closed vent system inspection	Record of each storage vessel cover inspection	Have you met requirements for §60.5410a (h)(2) & (3)?	Bypass requirements:		Monthly combustion device inspections (maintain record of			Records of the control device manufacturer's	Records of the assessment and certification for each
				Latitude	Longitude				Key Checked Out	Alarm Sounded	Pilot Light	Method 22	OVA		
Little Muddy South CTB	7.24	(VOC (scf/hr) * 1/379 (scf/lb-mol) * 45.19 (lb/lb-mol) * 0.798 * 8760 (hrs/yr) * 1 (ton/2000 lb) * control destruction efficiency / # of tanks	Monthly OVA inspections not completed. Method 22 and pilot light monitoring not completed. PE certification not completed.	(b) (9)	(b) (9)	See column D	See column D	Yes	N/A	N/A	See column D	See column D	See column D	Records are maintained in the file titled "1202000_VARIABLE ORIFICE FLARE SYSTEM" and saved within NinePoint electronic file structure.	See column D

¹ Examples of deviations include: VOC emissions not controlled by 95.9 percent within 60 days after startup; not meeting cover and closed vent system requirements; not meeting control device requirements.

² Monthly inspections must be separated by 14 calendar days.

³The location of the storage vessel shall be in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.

⁴ Reduce VOC emissions by 95% within 60 days of startup.

Storage Vessel			
Facility Name	Column Q	Column R	Column S
	Additional Data for Storage Vessel Annual Report [§60.5420a(b)(6)(i) through (vii)]		
	A statement that you have met control requirements ⁴	Identification and date of any storage vessel affected facility removed from service during the reporting period.	Identification and date of any storage vessel affected facility returned to service during the reporting period.
Little Muddy South CTB	Yes, Nine Point meeting the 95% control efficiency requirements	N/A	N/A

Storage Vessel											
	Column T	Column U	Column V	Column W	Column X	Column Y	Column Z	Column AA	Column AB	Column AC	Column AD
Facility Name	Additional Data for Control Device Performance Tested by Manufacturer (§60.5420a(C)(vi)(A) through (F))										
	Please provide the file name that contains the certification signed by a qualified professional engineer for each closed vent system routing to a control device or process.	Make, model and serial number of purchased device.	Date of purchase.	Copy of purchase order.	Location of the control device in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983	Recorded Inlet gas flow rate.	Records that the pilot flame is present at all times of operation.	Records that the device was operated with no visible emissions except for periods not to exceed a total of 1 minute during any 15 minute period.	Records of the maintenance and repair log.	Records of the visible emissions test following return to operation from a maintenance or repair activity.	Records of the manufacturer's written operating instructions, procedures and maintenance schedule to ensure good air pollution control practices for minimizing emissions.
Little Muddy South CTB	See column D	Steffes, SHP-6, S/N: 60916FCM/3002000 00	9/16/2016	Records are maintained in the file titled "Steffes quote EWW091616 (002)" and saved within Nine Point electronic file structure.	(b) (9)	7,220.54 Scf/hr	See column D	See column D	Records of maintenance and repair are kept within the Nine Point electronic file structure.	See column D	Records are maintained in the file titled "1202000_VARIABLE ORIFICE FLARE SYSTEM" and saved within Nine Point electronic file structure.

Fugitive Emissions												
Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K	Column L	Column M
Facility Name	The records of each monitoring survey [§60.5420a(e)(15)(ii)(A-H)]											Comments
	Date of the survey	Beginning time of the survey	End time of the survey	Name of operator and their training and experience	Monitoring instrument used	Digital photographs or videos from the OGI instrument ¹	Fugitive emissions component identification when Method 21 is used to perform the monitoring survey	Site Conditions			Any deviations from the monitoring plan or a statement that there are no deviations.	
								Ambient temperature	Sky conditions	Maximum wind speed		
Sanders CTB												
Larsen CTB	8/21/2017	10:00	11:30	Larry OGI Certification	FLIR GF300	See column P	N/A	67	Clear	20	None	The Larsen CTB became an affected facility as a collection of fugitive emissions components at a well site on 7/3/2017. The 60 day initial inspection period, per §60.5397a, falls outside the August 2, 2016 to August 1, 2017 reporting period of this submittal.
	8/24/2017	11:37	12:29	Larry OGI Certification	FUR GF300	N/A	N/A	73	Clear	5	None	
	8/30/2017	8:30	9:37	Larry OGI Certification	FUR GF300	See column P	N/A	67	Clear	15	None	
	9/23/2017	9:30	10:30	Larry OGI Certification	FUR GF300	MOV_0274	N/A	43	Cloudy	97	None	
	10/10/2017	13:37	14:10	Larry OGI Certification	FUR GF300	See column P	N/A	60	Clear	11	None	
J. Garvin Jacobson CTB												
Arnegard CTB												
Little Muddy South CTB												

¹The digital photograph must include the date the photograph was taken and the latitude and longitude of the collection of fugitive emissions.
²If a fugitive emissions component is not tagged, a digital photograph or video of each fugitive emissions component that could not be repaired

[illegible]